

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED WHOLESALE LLC,)
An Illinois Limited Liability Company,)
)
 Plaintiff,) No. 11 CV 02637
) Hon. Robert Dow
 v.)
)
 TRAFFIC JAM EVENTS, a Louisiana)
 Company,)
)
 Defendant.)

MOTION FOR LEAVE TO FILE NUN PRO TUNC

Plaintiff, by its attorneys The Law Offices of Bryan T. Butcher, sets forth its Motion for Leave to file Nun Pro Tunc as follows:

1. Defendant Your Preferred Printer ("YPP") filed a motion to dismiss Plaintiff's Amended Complaint on Venue and Jurisdictional issues.
2. Plaintiff filed a motion to extend and a request for Jurisdictional Discovery.
3. The court ordered Plaintiff to Respond to the Motion to Dismiss if practicable or if there are unrelated issues to the motion for jurisdictional discovery by 5/17/12 with a Replies due by 5/24/12.
4. Counsel for Plaintiff mistakenly believed his responses were due 5/24/12. Counsel filed his Reply to the Jurisdictional Motion on 5/24/12. Plaintiff is unable to appropriately respond to the Motion to Dismiss without the jurisdictional discovery requested and indicated such in his brief.
5. Allowing Plaintiff's brief filed on 5/24/12 to be reflected as filed on 5/17/12 Nun Pro Tunc will not prejudice Defendant as the issues are all laid out in Plaintiff's brief and Defendant's brief relative to the jurisdictional requests for discovery.
6. Additionally, the last order of court did not set a status date for the parties to appear.

Wherefore, Plaintiff respectfully request this Court grant Plaintiff leave to file its 5/24/12 filing Nun Pro Tunc and adjust any briefing schedules accordingly to accommodate the parties and this Court.

Respectfully submitted,

s/Bryan T. Butcher

Law Offices of Bryan T. Butcher
600 N. Fairbanks Ct. #1509
Chicago, Illinois 60611
(312) 498-8459
#6272014